



EXPORT PACKAGING

EPA Region 5 Records Ctr.



330489

August 2, 1984

Mr. Larry Eastep, Permit Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Dear Mr. Eastep:

I am writing this cover letter to accompany the enclosed "closure plan" form and to explain the circumstances for requesting closure.

Export Packaging Company uses 1-1-1 Trichloroethane in a cold cleaning operation to prepare parts for painting. In the past, we would pour spent 1-1-1 Trichloroethane from the cleaning tank into empty, D.O.T. approved barrels. We would accumulate barrels of spent material until we had reached approximately twenty barrels. At that time, we would have our supplier pick up the spent material and return it to a recycler.

On May 18, 1984, we received a Compliance Inquiry Letter from the Rockford Division office. In that letter, the office stated that since we were storing hazardous waste for a period longer than 90 days, we were in violation of RCRA Section 3010, and 35 ILL. Adm. Code 720.110 as we were not a permitted storage site.

We were further told that this problem could be remedied by: disposing of our waste within the 90 day period; and write to the Permit Section asking for closure of our plant as a storage site even though we never had been permitted for storage.

This is a brief history of our non-compliance as a storage site and the reason we are completing a closure form for hazardous waste storage. We are continuing the use of 1-1-1 Trichloroethane in our cleaning operation, but are disposing of all waste within 90 days. All answers on the closure form relate to the above mentioned "storage" of spent 1-1-1 Trichloroethane.

Sincerely,

David Coopman
Vice President-Sales

EXECUTIVE OFFICES
5420 River Drive
Moline, Illinois 61265
Phone (309) 757-0310

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CLOSURE PLAN

Name of Site: EXPORT PACKAGING CO., INC.

Site Location: EXPORT PACKAGING CO.

Street, R.R. # or P.O. Box 8501-42ND STREET WEST

City ROCK ISLAND State ILLINOIS Zip Code 61201

Name of Owner: EXPORT PACKAGING CO., INC.

Address: 5420 RIVER DRIVE

Street, R.R. # or P. O. Box P.O. Box 733

City MOLINE State ILLINOIS Zip Code 61265

Contact Name: DAVE COOPMAN

phone number (309) 757-0310

USEPA I.D. No. 1LD038409975 IEPA Site No. 1610650015G

Closure shall be: ☒ Complete ☐ Partial (check one)

1. Attach the Part A for this facility and a map diagram or picture showing the facility lay-out and the area(s) to be closed.

2. State the reason of closure.

WE WERE HOLDING SPENT 1-1-1 TRICHLOROETHANE IN BARRELS FOR PERIODS LONGER THAN 90 DAYS; THEREFORE, IN VIOLATION OF RCRA SECTION 3010 AND 35 ILL. ADM. CODE 720.11 ROCKFORD DIVISION SAID VIOLATION COULD BE CORRECTED BY CLOSING AS A STORAGE FACILITY.

3. Provide an estimate of the maximum inventory of waste in storage during the life of the facility. Include a list of hazardous wastes, their codes, and amount in storage at the time of closure.

A. TOTAL MAX. STORED AT ONE TIME UNTIL SENDING TO RECYCLER = 2,035 GAL.

B. HAZARDOUS WASTE WAS SPENT 1-1-1 TRICHLOROETHANE, UN 2831

C. AT TIME OF CLOSURE AS A "STORAGE FACILITY", THERE WAS NO HAZARDOUS WASTE IN STORAGE BEYOND 90 DAYS.

4. Provide a schedule of closure that briefly describes how and when the facility will be closed.

SINCE WE WERE HOLDING WASTE BEYOND 90 DAYS, WE WERE IN VIOLATION OF LAW AS WE WERE NOT PERMITTED AS A "STORAGE FACILITY". BY STORING NO LONGER THAN THE ALLOWABLE 90 DAY PERIOD, AND DISPOSING OF WHAT WE DID HAVE, WE WOULD NO LONGER BE IN VIOLATION. AT THE TIME OF ASKING FOR CLOSURE AS A "STORAGE FACILITY" THERE WERE NO DRUMS OF WASTE ON PREMISES.

AUG 09 1984

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RCRA CLOSURE & POST CLOSURE PLANS
EXPORT PACKAGING CO., INC
EPA I.D. #ILD038409975

Export Packaging Co., Inc. uses 1-1-1 Trichloroethane to clean parts it paints for various customers. This is a cold cleaning process and creates waste with the remains of Trichloroethane, oil, cutting fluids, and dirt. This waste has been determined to be hazardous by the EPA. There are no foreseeable plans to close our painting operation or to cease the cleaning operation which produces the waste 1-1-1 Trichloroethane. This plan was prepared to meet the regulations of 35 Ill. Adm. Code 725.212.

Cleaning Tanks

The planned closure activities at our site would be as follows:

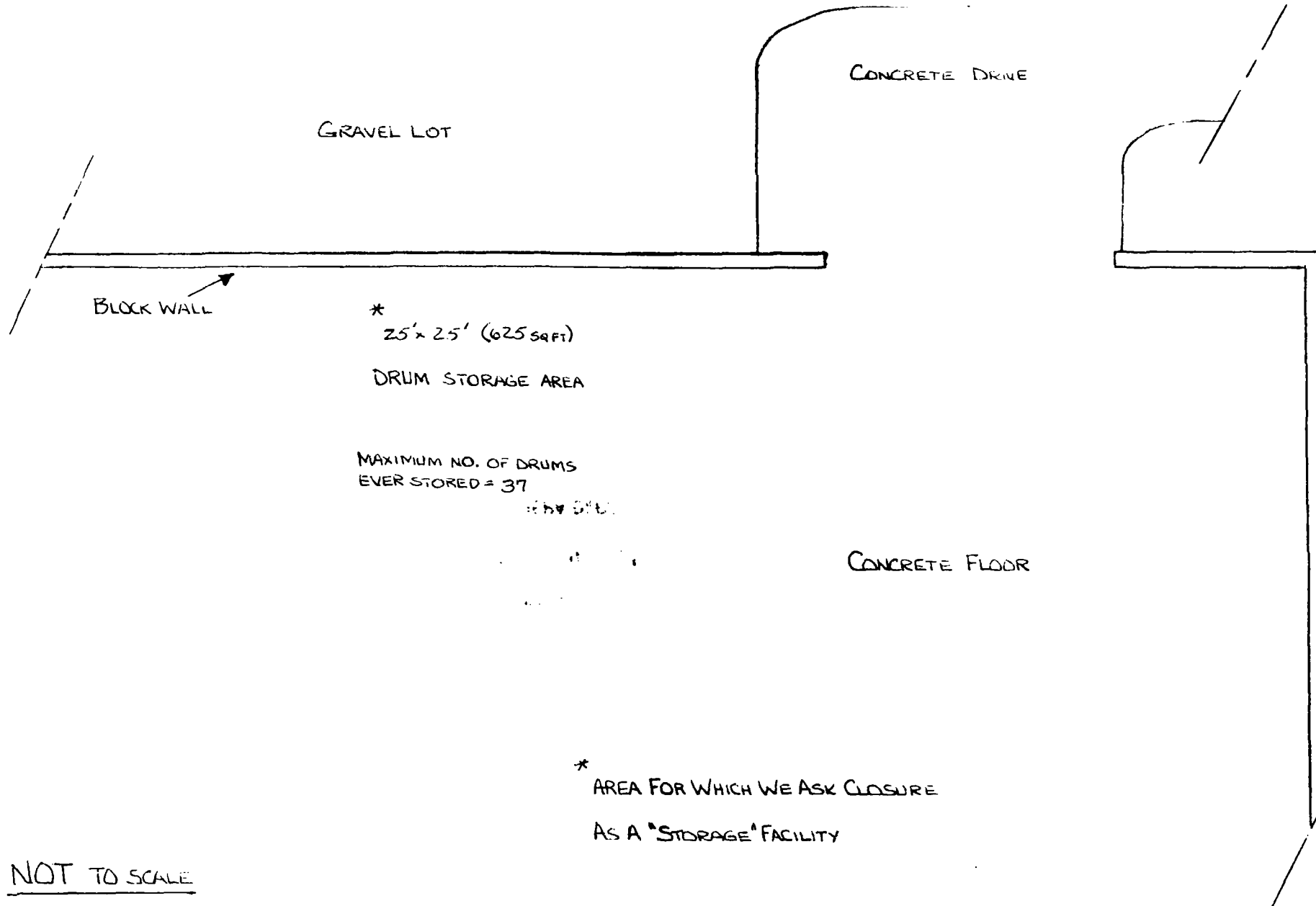
1. Discontinue the cleaning of parts.
2. Drain off all bottoms from cleaning tanks (2) into approved drums.
3. Clean tanks with virgin 1-1-1 Trichloroethane and wipe down. Tanks will now be considered non-hazardous and could be used for whatever else a need may arise.
4. Send drums of waste Trichloroethane to approved recycler as is now done.

Estimated time for items 2 through 4 is two days. Estimated cost is \$100.00 in worker's labor. As has been the case, the recycler hauls for no cost as he is free to sell the recycled Trichloroethane.

Post Closure

Since all tanks would be cleaned, and all drums of hazardous waste would be disposed of, no post closure care would be necessary.

NORTH
↓



NOT TO SCALE

ITEM #1
EXPORT PACKAGING CO
8201-42ND ST WEST
ROCK ISLAND, ILL